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COMMON PLEAS COURT

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CLERK OF COURT
JULIE A. HARRIS
100 N. HIGHWAY 124
MILLBURY, OH 43447

IN THE COMMON PLEAS COURT, ALLEN COUNTY, OHIO

Ryan Welling
2743 Lemoyne Road
Millbury, OH 43447,

Case No.

CV2021 0273

Judge

REED

Plaintiff,

COMPLAINT WITH JURY DEMAND
ENDORSED HEREON

v.

Palwinder Singh Randhawa
218 Martinvalley Mews NE
Calgary, AB T3J4W3,

Honeybee Transportation, Inc.
7885 Mount Olive Grove Blvd.
Windsor, OH N852A4,

Defendants.

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Attorneys for Plaintiff

Now comes Plaintiff, by and through counsel, and for his Complaint against Defendants Palwinder Singh Randhawa ("Randhawa") and Honeybee Transportation, Inc., states as follows:

1. On October 8, 2019, Plaintiff was operating his vehicle in the northbound lanes of Interstate 75 in Amanda Township, Allen County, Ohio.
2. At the same time, Defendant Randhawa was operating his tractor trailer unit immediately behind the Plaintiff.
3. Defendant Randhawa was operating within the course and scope of his employment with Defendant Honeybee Transportation at the time of the accident.

4. Plaintiff slowed his vehicle due to construction on the road, at which point he was forcibly struck in the rear by Defendant Randhawa, apparently because Defendant Randhawa was not paying attention to the road conditions.

5. Defendant Randhawa was not only given a citation by the Ohio State Highway Patrol for failure to maintain an assured clear distance, but was also issued a citation for distracted driving, since he was using his cellular phone device at the time of the accident.

6. Due to the collision, Plaintiff sustained physical injuries to his body requiring medical care and treatment.

7. To this day, Plaintiff continues to undergo medical care and treatment for his injuries and expects that the treatment will last indefinitely into the future or may even be permanent.

8. Plaintiff also suffers from post-traumatic stress disorder and undergoes treatment for same.

9. In addition to incurring medical bills, Plaintiff has also sustained a loss of earnings.

10. All of Plaintiff's injuries and damages were caused due to the negligence and carelessness of Defendant Randhawa.

11. Defendant Honeybee Transportation, Inc. is vicariously liable for the acts of its agent/employee Palwinder Singh Randhawa.

WHEREFORE, Plaintiff Ryan Welling demands judgment against Defendants Palwinder Singh Randhawa and Honeybee Transportation, Inc., jointly and severally, in an amount in excess of \$25,000, together with costs incurred herein.

Respectfully Submitted,



Robert J. Bahret
Attorney for Plaintiff